



3. There are six (6) defendants in this lawsuit: (1) United InvestexUSA 10, LLC d/b/a New Western Acquisitions; (2) United InvestexUSA 2, LLC d/b/a New Western Acquisitions; (3) UI Holdings, LLC; (4) Stuart Denyer; (5) Kurt Carlton; and (6) Paul Hess. Do any of you know or have any familiarity with any of the defendants I just named? If so,

- a. Please identify the defendant, or defendants, you know.
- b. How do you know that defendant?
- c. Do you know anybody that works for United InvestexUSA 10, LLC d/b/a New Western Acquisitions presently or in the past?
- d. Do you know anybody that works for United InvestexUSA 2, LLC d/b/a New Western Acquisitions presently or in the past?
- e. Do you know anybody that works for UI Holdings, LLC presently or in the past?

4. Do you know or have any familiarity with any of the following attorneys or their law firms? If so, how do you know these attorneys or law firms?

- a. Ashmore & Ashmore Law Firm
- b. KC Ashmore
- c. Wick Phillips Gould & Martin, LLP
- d. Brant Martin
- e. Molly Jones
- f. Zachary Farrar

5. Do you know, or think you know, any of the following people, who are potential witnesses in this case? If so, how?

- a. Mr. Benson, the Plaintiff.
- b. Stuart Denyer, one of the Defendants.

- c. Kurt Carlton, one of the Defendants.
  - d. Paul Hess, one of the Defendants.
  - e. J.D. Castillo, the General Manager for United InvestexUSA 10, LLC d/b/a New Western Acquisitions.
  - f. Tom Keen.
  - g. Marcia Jackson.
6. During the past ten (10) years, have any of you served on a jury – civil or criminal?
- a. Please raise your hand if it was civil.
  - b. Keep you hand raised if you reached a verdict.
  - c. Please raise your hand if it was criminal.
  - d. Keep you hand raised if you reached a verdict.
7. Have any of you or a family member ever been a party to a lawsuit?
- a. Were you or the family member the plaintiff or defendant?
  - b. Is there anything about that experience that would cause you to question your ability to decide this case fairly and impartially, only on the evidence admitted during trial, and the law as the Court instructs?
8. Have you or anyone in your immediate family attended law school or had any other training in the law? If so, is there anything about that experience that would cause you to question your ability to decide this case fairly and impartially, only on the evidence admitted during trial, and the law as the Court instructs?
9. Does anyone have a concern about their ability to be a fair and impartial juror in this case?

10. Does anyone have a medical reason or personal hardship that would make it difficult to serve as a juror in this case?

11. Does anyone have difficulty reading, hearing, or understanding the English language?

12. Have you read in the newspapers, read on the internet, seen on television, heard on the radio, or seen on social media anything about this case, or do you have any knowledge of the facts or events of this case?

13. Do you or a family member work in the real estate industry?

14. Have any of you served as an independent contractor? In other words, have any of you reported your compensation for tax purposes to the Internal Revenue Service via a Form 1099, rather than a Form W-2? If so, can you briefly describe your role and experience?

15. In a lawsuit, there are primarily two (2) sides—the plaintiff and the defendant. In certain instances, both sides will claim that the other did something wrong in violation of the law. For example, sometimes the plaintiff will complain that the defendant did something bad and should be found responsible for damages, and the defendant will complain that the plaintiff also did something bad and should be found responsible for damages too. But that is not always the case. Sometimes, only one side complains that the other side did something wrong that allows for the recovery of damages. Does anybody have a predisposition or preconceived notion that a defendant who has not asserted a counterclaim against the plaintiff must automatically be in the wrong?

Defendants request that the Court ask the prospective jurors the foregoing questions. Defendants further respectfully request an opportunity for their counsel to be able to individually question prospective jurors after the Court has concluded its inquiries.

Respectfully submitted,

s/ Molly M. Jones

Brant C. Martin

[brant.martin@wickphillips.com](mailto:brant.martin@wickphillips.com)

State Bar No. 24002529

Molly M. Jones

[molly.jones@wickphillips.com](mailto:molly.jones@wickphillips.com)

State Bar No. 24100271

Zachary C. Farrar

[zachary.farrar@wickphillips.com](mailto:zachary.farrar@wickphillips.com)

State Bar No. 24093418

WICK PHILLIPS GOULD & MARTIN LLP

100 Throckmorton Street, Suite 1500

Fort Worth, Texas 76102

Telephone: 817.332.7788

Facsimile: 817.332.7789

**ATTORNEYS FOR DEFENDANTS**

**UNITED INVESTEXUSA 10, LLC D/B/A**

**NEW WESTERN ACQUISITIONS, UNITED**

**INVESTEXUSA 2, LLC D/B/A NEW**

**WESTERN ACQUISITIONS, UI HOLDINGS,**

**LLC, STUART DENYER, KURT CARLTON,**

**AND PAUL HESS**

**CERTIFICATE OF SERVICE**

On August 4, 2020, the foregoing document was electronically submitted with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that all counsel of record has been served electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

s/ Molly M. Jones

Molly M. Jones